

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TIMOTHY FRANKS,	:	CIVIL ACTION NO. 02-2652
	:	
<i>Plaintiff,</i>	:	
	:	
vs.	:	
	:	
COUNTY OF LEHIGH,	:	
THOMAS LAZORIK,	:	
BRIAN KAHLER, TED KEHM	:	
JANICE E. NESBIT, JANE	:	
BAKER, AND RICHARD O. KLOTZ,	:	
	:	
<i>Defendants.</i>	:	

**PLAINTIFF'S ANSWER TO DEFENDANTS'
APPLICATION FOR COUNSEL FEES AND ASSOCIATED EXPENSES**

Plaintiff, Timothy Franks, by and through his attorneys, Sidney L. Gold & Associates, P.C., hereby moves for an Order striking the Defendants' application for counsel fees and associated expenses, pursuant to 42 U.S.C. §12205 on the grounds that the said Motion was filed in violation of Rule 54 of the Federal Rules of Civil Procedure, Rule 54(d)(1), and Rule 54 (d)(2)(B) in that the said Application was filed on an untimely basis.

Respectfully submitted,

SIDNEY L. GOLD & ASSOCIATES, P.C.

S/Sidney L. Gold, Esq.- SG-1387

SIDNEY L. GOLD, ESQUIRE

Identification No.: 21374

1835 Market Street - Suite 515

Philadelphia, PA 19103

(215) 569-1999

Attorney for Plaintiff